

# EXHIBIT 1

EXHIBIT 1

1 Katherine F. Parks, Esq.  
2 Nevada Bar No. 6227  
3 Thorndal Armstrong, PC  
4 6590 S. McCarran Blvd., Suite B  
5 Reno, Nevada 89509  
6 Tel: (775) 786-2882  
7 kfp@thorndal.com  
8 Attorney for Defendants  
9 CARSON CITY

REC'D & FILED  
2024 FEB 29 PM 4:17  
WILLIAM SCOTT HOEN  
D. ORTIZ  
BY \_\_\_\_\_ DEPUTY

10 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
11  
12 IN AND FOR CARSON CITY

13 DREW J. RIBAR,

14 Plaintiff,

15 vs.

16 STATE OF NEVADA EX. REL. NEVADA  
17 DEPARTMENT OF CORRECTIONS,  
18 CARSON CITY AND ITS SHERIFFS  
19 OFFICE, CARSON CITY DISTRICT  
20 ATTORNEYS OFFICE, CARSON CITY  
21 MANAGERS OFFICE, FERNANDEIS  
22 FRAZAIER IN HIS OFFICIAL CAPACITY  
23 AS WARDEN OF NORTHERN NEVADA  
24 CORRECTIONAL, AARON RYDER IN HIS  
25 OFFICIAL CAPACITY AS AN OFFICER OF  
26 NEVADA DEPARTMENT OF  
27 CORRECTIONS, ROBERT SMITH IN HIS  
28 OFFICIAL CAPACITY AS AN OFFICER OF  
NEVADA DEPARTMENT OF  
CORRECTIONS, JASON BUENO IN HIS  
OFFICIAL CAPACITY AS AN OFFICER OF  
CARSON CITY SHERIFF, SEAN  
PALAMAR RYDER IN HIS OFFICIAL  
CAPACITY AS AN OFFICER OF CARSON  
CITY SHERIFF, TYSON DARIN LEAGUE  
RYDER IN HIS OFFICIAL CAPACITY AS  
AN OFFICER OF CARSON CITY DISTRICT  
ATTORNEY, JAMES DZURENDA  
(DIRECTOR NEVADA DEPARTMENT OF  
CORRECTIONS), JASON D. WOODBURY  
(CARSON CITY DISTRICT ATTORNEY),  
KENNETH T. FURLONG IN HIS  
CAPACITY AS SHERIFF CARSON CITY,  
NV, OFFICER/DEPUTY/J. DOE 1-99,

Defendants:

Case No. 24 OC 00022 1B

Dept. No. II

**NOTICE OF REMOVAL**

1 TO: Plaintiff, DREW J. RIBAR:

2 PLEASE TAKE NOTICE that Defendants CARSON CITY, by and through their  
3 attorneys of record, Thorndal Armstrong, PC, have removed this action to the United States  
4 District Court, District of Nevada, pursuant to 28 U.S.C. §§ 1331 and 1441. A true and correct  
5 copy of the Petition for Removal filed in the United States District Court, District of Nevada, is  
6 attached hereto as Exhibit "1."

7 **AFFIRMATION**

8 **Pursuant to NRS 239B.030 and 603A.040**

9 The undersigned hereby affirms that this document does not contain the personal  
10 information of any person.

11 DATED this 29<sup>th</sup> day of February, 2024.

12 THORNDAL ARMSTRONG, PC

13 By: Katherine F. Parks  
14 KATHERINE F. PARKS, ESQ.  
15 Nevada Bar No. 6227  
16 6590 S. McCarran Blvd., Suite B  
17 Reno, Nevada 89509  
18 Attorney for Defendants  
19 CARSON CITY  
20  
21  
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23  
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25  
26  
27  
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Thorndal Armstrong, PC, and that on this date I caused the foregoing NOTICE OF REMOVAL to be served on all parties to this action by:

☒ placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada.

☐ personal delivery/Reno Carson Messenger Service

☐ electronic means (facsimile or electronic mail)

☐ Federal Express/UPS or other overnight delivery

fully addressed as follows:

Drew J. Ribar  
3480 Pershing Ln  
Washoe Valley, NV 89704  
Pro Se Plaintiff

DATED this 29<sup>th</sup> day of February, 2024.



An employee of Thorndal Armstrong, PC

INDEX OF EXHIBITS

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1	Petition for Removal	16

# EXHIBIT 1

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7 kfp@thorndal.com  
8 Attorney for Defendants  
9 CARSON CITY

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA  
12

13 DREW J. RIBAR,  
14  
15 Plaintiff,

16 vs.

Case No.

17 STATE OF NEVADA EX. REL. NEVADA  
18 DEPARTMENT OF CORRECTIONS,  
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(CARSON CITY DISTRICT ATTORNEY),  
KENNETH T. FURLONG IN HIS  
CAPACITY AS SHERIFF CARSON CITY,  
NV, OFFICER/DEPUTY/J. DOE 1-99,

Defendants.

**PETITION FOR REMOVAL TO  
FEDERAL COURT**

COMES NOW Defendants CARSON CITY, by and through their attorneys Thorndal Armstrong, PC, and provide notice of removal of this action to the United States District Court for the District of Nevada pursuant to 28 U.S.C. §1441.

**I. INTRODUCTION**

Plaintiff DREW RIBAR has sued the Defendants in Nevada state court presenting a cause of action for alleged violation of his constitutional rights under the First, Fourth, Fifth, Eighth and Fourteenth Amendments of the United States Constitution. Defendants thus remove this case based on the existence of federal questions pursuant to 28 U.S.C. §1331.

**II. PROCESS, PLEADINGS, AND ORDERS RECEIVED BY DEFENDANTS**

The Plaintiff filed his Complaint in First Judicial District Court on January 29, 2024, and the Carson City Defendants identified in the Complaint received a copy of the Complaint on or about February 12, 2024. A true and correct copy of the Complaint is attached hereto as Exhibit "1."

**III. THE COURT HAS JURISDICTION UNDER 28 U.S.C. §1331**

This Court has original jurisdiction over this case pursuant to 28 U.S.C. §1331, as Plaintiff's Complaint contains claims based in federal law. See, Exhibit "1."

**IV. THIS REMOVAL IS TIMELY.**

The Carson City Defendants received the Complaint on February 12, 2024. This Petition is being filed on February 29, 2024, a date less than thirty (30) calendar days after the Complaint was received by the Defendants, and, accordingly, the removal is timely. See, 28 U.S.C. §1446(C)(3).

**V. DEFENDANTS HAVE MET ALL OTHER REQUIREMENTS FOR REMOVAL.**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1331. Removal is proper pursuant to 28 U.S.C. §1441.

2. Defendants attach to this Petition as Exhibit 1, a true and correct copy of the Complaint.

3. Defendants will promptly file a copy of this Petition for Removal in the First Judicial District Court of the State of Nevada in and for Carson City pursuant to 28 U.S.C.



1 §1446(d).

2 4. Defendants have served this Petition for Removal upon Plaintiff Drew Ribar.

3 DATED this 29<sup>th</sup> day of February, 2024.

4 THORNDAL ARMSTRONG, PC

5  
6 By: /s/ Katherine Parks  
7 KATHERINE F. PARKS, ESQ.  
8 Nevada Bar No. 6227  
9 6590 S. McCarran Blvd., Suite B  
10 Reno, Nevada 89509  
11 Attorney for Defendants  
12 CARSON CITY  
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Thorndal Armstrong, PC, and that on this date I caused the foregoing PETITION FOR REMOVAL TO FEDERAL COURT to be served on all parties to this action by:

X placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada.

       United States District Court CM/ECF Electronic Filing Process

       hand delivery

       electronic means (fax, electronic mail, etc.)

       Federal Express/UPS or other overnight delivery

fully addressed as follows:

Drew J. Ribar  
3480 Pershing Ln  
Washoe Valley, NV 89704  
Pro Se Plaintiff

DATED this 29<sup>th</sup> day of February, 2024.

/s/ Laura Bautista  
An employee of Thorndal Armstrong, PC

INDEX OF EXHIBITS

Exhibit No.	Description
1	Complaint

## **Exhibit 1 – Complaint**

**Exhibit 1**

1 Drew J. Ribar  
2 3480 Pershing Ln  
3 Washoe Valley NV 89704  
4 775-223-7899  
5 Const2Ardil@gmail.com  
6 Pro Se

FILED  
2024 JAN 29 PM 3:51  
CLERK OF COURT  
CLERK  
CLERK

7 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
8  
9 IN AND FOR CARSON CITY

10 DREW J RIBAR,  
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12 Plaintiff,

13 vs.

14 STATE OF NEVADA EX REL NEVADA  
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16 CITY AND ITS SHERIFFS OFFICE, CARSON  
17 CITY DISTRICT ATTORNEYS OFFICE,  
18 CARSON CITY MANAGERS OFFICE,  
19 FERNANDEIS FRAZIER IN HIS OFFICIAL  
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CARSON CITY SHERIFF, TYSON DARIN  
LEAGUE RYDER IN HIS OFFICIAL CAPACITY  
AS AN OFFICER OF CARSON CITY  
DISTRICT ATTORNEY, JAMES DZURENDA  
(DIRECTOR NEVADA DEPARTMENT OF  
CORRECTIONS), JASON D WOODBURY  
(CARSON CITY DISTRICT ATTORNEY),  
KENNETH T FURLONG IN HIS CAPACITY AS

Case No: 240 C 0032 ID  
Deputy

COMPLAINT

JURY TRIAL DEMANDED

(EXEMPT FROM ARBITRATION PER NAR  
3(A) DECLARATORY RELIEF REQUESTED)

OPPRESSION OF CONSTITUTIONAL RIGHTS  
NV CONSTITUTION ART. 1 SEC. 18, ART. 1  
SEC. 9, ART 1. SEC 8, ART 1. SEC 6, ART 1.  
SEC. 1. UNITED STATES CONSTITUTION  
1ST AMENDMENT, 4TH AMENDMENT, 5TH  
AMENDMENT, 8TH AMENDMENT, 14TH  
AMENDMENT (NRS 197.200/42 USC 1983),  
RECORDING OF LAW ENFORCEMENT  
(NRS 171.1233), RECKLESS DRIVING (NRS  
484B.653), FALSE IMPRISONMENT (NRS  
200.460), BATTERY NRS 200.481, ASSAULT  
NRS 200.471, COERCION (NRS 207.190),  
KIDNAPPING (NRS 200.310), UNLAWFUL  
TAKING OF VEHICLE (NRS 205.2715),  
GRAND LARCENY (NRS 205.220),  
MALICIOUS PROSECUTION (NRS 199.310)

COMPLAINT JURY TRIAL DEMANDED (EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY  
RELIEF REQUESTED) OPPRESSION OF CONSTITUTIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18,  
ART. 1 SEC. 9, ART 1. SEC 8, ART 1. SEC 6, ART 1. SEC. 1. UNITED STATES CONSTITUTION 1ST  
AMENDMENT, 4TH AMENDMENT, 5TH AMENDMENT, 8TH AMENDMENT, 14TH AMENDMENT (NRS  
197.200/42 USC 1983), RECORDING OF LAW ENFORCEMENT (NRS 171.1233), RECKLESS DRIVING (NRS  
484B.653), FALSE IMPRISONMENT (NRS 200.460), BATTERY NRS 200.481, ASSAULT NRS 200.471,  
COERCION (NRS 207.190), KIDNAPPING (NRS 200.310), UNLAWFUL TAKING OF VEHICLE (NRS  
205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 1

1 SHERIFF CARSON CITY NV,  
2 OFFICER/DEPUTY/J. DOE 1-99

3 Defendant

4 COMES NOW, the Plaintiff, Drew J. Ribar, Pro Se. Entering a complaint against Fernandeis  
5 Frazier (Warden at Northern Nevada Correctional Center with Nevada Department of  
6 Corrections / NDOC on 2022/08/30), Aaron Ryder (Lt. Nevada NDOC), Robert Smith (Sgt.  
7 NDOC), Jason Bueno (Deputy Carson City Sheriff's Office / CCSO), Sean Palamar (Deputy  
8 CCSO), Tyson Darin League (Supervising Deputy District Attorney Carson City District  
9 Attorney's Office), James Dzurenda (Director NDOC), Jason D Woodbury (Carson City District  
10 Attorney), Kenneth T Furlong (Sheriff CCSO), Nevada Department of Corrections, Carson City  
11 NV and its Sheriff's Office, District Attorney's Office and it's City Manager's Office.  
12

13 **Demand for Jury Trial**  
14

15 **Paragraph 1. Jurisdiction**  
16

- 17 1. Mr. Ribar is a resident of Washoe Valley, Nevada, and operates a business  
18 located in Carson City, Nevada. The Nevada Department of Corrections  
19 (NDOC) main office is also located in Carson City, Northern Nevada  
20 Correctional Center (location of arrest) operated by NDOC located in Carson  
21 City, Carson City Sheriff's office located in Carson City, Carson City District  
22 Attorney's office is in Carson City. Because the incident and the individuals  
23 involved are all proximate to Carson City, Nevada, the First Judicial Court of  
24 Nevada has territorial jurisdiction over this case.

25 COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY  
26 RELIEF REQUESTED) OPPRESSION OF CONSTITUTIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18,  
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205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 2

1 2. The Nevada Department of Corrections (NDOC), Carson City Sheriff's Office,  
2 Carson City District Attorney's Office and Carson City Nevada are all proper  
3 parties to this lawsuit. All these governmental entities have vicarious liability  
4 and are responsible for training their employees on the laws they are required  
5 to obey, providing employees with clear guidance on their duties and  
6 responsibilities. The Defendants should have ensured their employees clearly  
7 understood and were trained not only in Nevada law NRS 171.1233 and others  
8 but also Fordyce V Seattle and others that has been caselaw throughout the  
9 9<sup>th</sup> Circuit over 4 decades and affirmed in many other US Courts of Appeals  
10 and many State Courts reaffirming Our Constitutional Rights regarding a  
11 Free Press, Right to Due Process and Rights to be free of any unwarranted,  
12 unlawful and unconstitutional searches or seizures.  
13

14  
15 3. All individuals named are proper parties to this lawsuit as all took actions or  
16 failed to take actions against Mr. Ribar in denying and oppressing his  
17 Constitutional Rights and violated laws in the process of this oppression  
18 whether by direct action of by lack of action over subordinates when notified  
19 of the violations of Rights.  
20

21 4. This Court has jurisdiction and authority based on Mack V Williams NV  
22 Supreme Court decision defining that government employees can be held  
23 personally responsible and have no qualified immunity for Constitutional  
24 violations.

25 COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY  
26 RELIEF REQUESTED) OPPRESSION OF CONSTITUTIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18,  
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205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 3

Paragraph 2. Facts & Cause of Action

1. On August 30, 2022, plaintiff Drew J Ribar went to Northern Nevada Correctional Center located at 1721 E Snyder Ave. Carson City Nevada and began recording in front of the prison facilities sign on the public road at the corner of Snyder Avenue and the public road leading to the prison's visitor parking lot. After finishing his recording Mr. Ribar got back into his truck and began driving down the public road heading to the prison's visitor center when suddenly from oncoming traffic, a plain, unmarked white van with no emergency lights or any identifying marks crossed over the double line trying to run Mr. Ribar off the road, detaining him. US Const. 4<sup>th</sup>, 5<sup>th</sup>, 14<sup>th</sup> Amend. NV Const. Art 1. Sec. 1., 8., 18., NRS 484B.653 Reckless Driving, NRS 200.460 False Imprisonment.
2. Defendant Lt. Aaron Ryer #10300 who is a "peace officer" NRS 289.220 was driving the van "in willful or wanton disregard of the safety of persons or property on a highway or premises to which the public has access" by crossing the double lines while heading in the opposite direction of travel and blocking Mr. Ribar from traveling down the public right of way and detaining him. Once Mr. Ribar stopped Lt. Ryer identified himself and told Mr. Ribar to "go off property to record" then restated "I need you to film off the property". NV Const Art. 1. Sec. 9., US Const. 1<sup>st</sup> Amend NRS 171.1233
3. Mr. Ribar was blocked in with his truck, a long wheelbase, extended cab, long bed dually GMC K3500 by Lt. Ryer in his van in front of Mr. Ribar and

COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY RELIEF REQUESTED) OPPRESSION OF CONSTITUTIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18, ART. 1 SEC. 9, ART 1. SEC 8, ART 1. SEC 6, ART 1. SEC. 1. UNITED STATES CONSTITUTION 1ST AMENDMENT, 4TH AMENDMENT, 5TH AMENDMENT, 8TH AMENDMENT, 14TH AMENDMENT (NRS 197.200/42 USC 1983), RECORDING OF LAW ENFORCEMENT (NRS 171.1233), RECKLESS DRIVING (NRS 484B.653), FALSE IMPRISONMENT (NRS 200.460), BATTERY NRS 200.481, ASSAULT NRS 200.471, COERCION (NRS 207.190), KIDNAPPING (NRS 200.310), UNLAWFUL TAKING OF VEHICLE (NRS 205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 4



Officer Doe in a white Jeep behind Mr. Ribar not allowing Mr. Ribar movement of his vehicle in a safe manner, thereby detaining Mr. Ribar depriving him of his liberty. US Constitution 4<sup>th</sup> & 14<sup>th</sup> Amendment Nevada Constitution Art. 1, Section 1 & 8.

4. Mr. Ribar then exited his truck and the officers refused to engage in further conversation, with his camera recording to disseminate to the public he walked back to the entrance of the public road to the prison visitor center and crossed Snyder Ave to get a full view of any potential signs that restricted access to the property and there were none. Mr. Ribar then proceeded to walk back to his truck, the temperature was approximately 95 degrees, a very hot day in the sun. When Mr. Ribar returned to his truck he then, on foot, approached Lt. Ryer who was sitting in his van blocking the truck of Mr. Ribar, Lt. Ryer was not communicative so Mr. Ribar informed him he was exercising his Constitutional Rights to film in publicly accessible areas and case law of *Fordyce V Seattle* 9<sup>th</sup> Cir. (additional case law *Crago v Leonard* 9<sup>th</sup> Cir., *Barich v City of Cotati* 9<sup>th</sup> Cir., *Glik v Cunniffe* 1<sup>st</sup> Cir., *Perkins v Hart* 5<sup>th</sup> Cir., *Dewitt v Haney* 11<sup>th</sup> Cir., *Irizarry v Yehia* 10<sup>th</sup> Cir., *Martin v Goss* 1<sup>st</sup> Cir., etc...).
5. Mr. Ribar then proceeded to walk down the left-hand side of the road heading to the visitor center when Sgt. Robert Smith (also on foot) approached Mr. Ribar blocking Mr. Ribar's path (detaining him yet again) of travel and liberty stating, "We have called the Sheriff Dept.", "Can not have you walking around

COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY RELIEF REQUESTED) OPPRESSION OF CONSTITUTIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18, ART. 1 SEC. 9, ART 1. SEC 8, ART 1. SEC 6, ART 1. SEC. 1. UNITED STATES CONSTITUTION 1ST AMENDMENT, 4TH AMENDMENT, 5TH AMENDMENT, 8TH AMENDMENT, 14TH AMENDMENT (NRS 197.200/42 USC 1983), RECORDING OF LAW ENFORCEMENT (NRS 171.1233), RECKLESS DRIVING (NRS 484B.653), FALSE IMPRISONMENT (NRS 200.460), BATTERY NRS 200.481, ASSAULT NRS 200.471, COERSCION (NRS 207.190), KIDNAPPING (NRS 200.310), UNLAWFUL TAKING OF VEHICLE (NRS 205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 5

here filming for safety reasons". NRS 171.1233, NRS 207.190, NV Const Art. 1. Sec. 1 & 9., US Const. 1<sup>st</sup> 4<sup>th</sup> & 14<sup>th</sup> Amend.

6. Mr. Ribar had a conversation with Sgt. Smith when Sgt. Smith states, "this is a public road" and then steps aside to allow Mr. Ribar to make his way down the road into the visitor parking lot when a black man in a blue shirt comes outside stating "you are in an unauthorized position". The man in the blue shirt refused to identify himself (after the arrest he has been identified as Warden Fernandeis Frazier) after being asked multiple times what his name was and refusing a conversation with Mr. Ribar. Within seconds Carson City Sheriff deputies Jason Bueno and Sean Palamar arrived and the man in the blue shirt (Warden Frazier) said that Mr. Ribar was "trespassing" NRS 207.200, and Mr. Ribar was unlawfully arrested (Case No. 22 CR 01231 1C status: **DISMISSED**) without any notice to leave under threat of arrest or Due Process to be trespassed. US Constitution 4<sup>th</sup> and 5<sup>th</sup> Amendment, Nevada Constitution Art. 1 Sec. 1& 8., Thomspon V Clark US Supreme Court.
7. Mr. Ribar was handcuffed, his property taken, his body and clothes searched, he was then placed in the back of Deputy Jason Bueno Sheriff patrol vehicle. Deputy Bueno proceeded to roll up all windows, close the center divider with all air conditioning vents in the prisoner compartment closed, depriving Mr. Ribar of any air movement inside the prisoner compartment where Mr. Ribar was locked inside the vehicle on a 95-degree day in full sun on a sweltering hot day. Deputy Beuno spent some time talking to the other government

COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY RELIEF REQUESTED) OPPRESSION OF CONSTITUIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18, ART. 1 SEC. 9, ART 1. SEC 8, ART 1. SEC 6, ART 1. SEC. 1. UNITED STATES CONSTITUTION 1ST AMENDMENT, 4TH AMENDMENT, 5TH AMENDMENT, 8TH AMENDMENT, 14TH AMENDMENT (NRS 197.200/42 USC 1983), RECORDING OF LAW ENFORCEMENT (NRS 171.1233), RECKLESS DRIVING (NRS 484B.653), FALSE IMPRISONMENT (NRS 200.460), BATTERY NRS 200.481, ASSAULT NRS 200.471, COERSCION (NRS 207.190), KIDNAPPING (NRS 200.310), UNLAWFUL TAKING OF VEHICLE (NRS 205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 6

officers involved before coming back to the patrol vehicle, where he sat in the driver's seat and had a device that he appeared to put under his duty vest to cool himself off. Deputy Bueno then drove Mr. Ribar to the jail while Mr. Ribar dripped in sweat, with the sweat falling into his eyes he was unable to wipe them, he suffered stinging pain and unable to focus his vision suffering in the heat being "hot boxed", which is in fact "cruel and unusual punishment" and this same treatment of an animal is a crime in the State of Nevada (NRS 202.487, NRS 574.055), while at the same time deputy Bueno had a device to cool himself under his duty vest with air conditioning blowing on himself. US Const 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendments, NV Const Art 1. Sec. 1., 6., 8., 9., 18., 42 USC 1983 action for deprivation of rights, NRS 197.200 Oppression under color of office, NRS 171.1233 Recording of law enforcement activity, NRS 200.460 False imprisonment, NRS 200.481 Battery, NRS 200.471 Assault, NRS 207.190 Coercion, NRS 200.310 Kidnapping.

8. At the same time Mr. Ribar was being "hotboxed" his truck was being impounded for parking on the side of a public roadway well off the pavement, was causing NO hindrance to other vehicles moving safely down the roadway and there were not any signs regulating parking near Mr. Ribar's truck. Deputy Sean Palamar was having Mr. Ribar's property taken by Cal-Neva Transport & Tow Inc. executing a "Nonconsensual tow" (NRS 706.4022), seizing Mr. Ribar's property, denying him of its use until a fee was paid to

COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY RELIEF REQUESTED) OPPRESSION OF CONSTITUTIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18, ART. 1 SEC. 9, ART 1. SEC 8, ART 1. SEC 6, ART 1. SEC. 1. UNITED STATES CONSTITUTION 1ST AMENDMENT, 4TH AMENDMENT, 5TH AMENDMENT, 8TH AMENDMENT, 14TH AMENDMENT (NRS 197.200/42 USC 1983), RECORDING OF LAW ENFORCEMENT (NRS 171.1233), RECKLESS DRIVING (NRS 484B.653), FALSE IMPRISONMENT (NRS 200.460), BATTERY NRS 200.481, ASSAULT NRS 200.471, COERCION (NRS 207.190), KIDNAPPING (NRS 200.310), UNLAWFUL TAKING OF VEHICLE (NRS 205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 7

redeem it. US Const. 4<sup>th</sup>, 5<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup> Amend, NV Const Art 1. Sec. 1, 6, 8, 18,  
NRS 205.2715 Unlawful Taking of Vehicle, NRS 205.220 Grand Larceny.

9. After his arrest and release from jail, Mr. Ribar wrote letters and personally  
visited the Sheriff's office and the Office of the Carson City District Attorney  
describing why the arrest and incidents were unlawful and unconstitutional.  
The Sherrif and Carson City Attorney decided not to investigate or prosecute  
their own actions and instead went ahead with prosecuting the case against  
Mr. Ribar by proceeding to amend the complaints removing the filming and  
recording aspects from the original complaints, deleting the reasoning  
"probable cause" for removing Mr. Ribar and being arrested having anything  
to do with filming after Mr. Ribar made them aware of NRS 171.1233. After  
time and money spent by Mr. Ribar to defend this case the prosecution  
offered a plea deal to pay a fine, plead "no contest" and then on December 20,  
2023, the prosecutor Jason Woodbury and Tyson Darin League would  
dismiss the case. The prosecutor never had any probable cause to pursue a  
case against Mr. Ribar. This put Mr. Ribar in a position to choose to spend  
close to \$30,000.00 and go through a trial or to accept the plea that in the  
end would have the same result as the case being dismissed. The  
prosecutions' goal in forcing the settlement requiring Mr. Ribar to pay an  
unjust fine and deny his 1<sup>st</sup> Amendment Right to gather and disseminate  
information to the public was to "teach a lesson" for NO Constitutional or

COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY  
RELIEF REQUESTED) OPPRESSION OF CONSTITUTIONAL RIGHTS NV CONSTITUTION ART. 1 SEC. 18,  
ART. 1 SEC. 9, ART 1. SEC 8, ART 1. SEC 6, ART 1. SEC. 1. UNITED STATES CONSTITUTION 1ST  
AMENDMENT, 4TH AMENDMENT, 5TH AMENDMENT, 8TH AMENDMENT, 14TH AMENDMENT (NRS  
197.200/42 USC 1983), RECORDING OF LAW ENFORCEMENT (NRS 171.1233), RECKLESS DRIVING (NRS  
484B.653), FALSE IMPRISONMENT (NRS 200.460), BATTERY NRS 200.481, ASSAULT NRS 200.471,  
COERSCION (NRS 207.190), KIDNAPPING (NRS 200.310), UNLAWFUL TAKING OF VEHICLE (NRS  
205.2715), GRAND LARCENY (NRS 205.220), MALICIOUS PROSECUTION (NRS 199.310) - 8

lawful reason. US Const. 1<sup>st</sup> 4<sup>th</sup>, 5<sup>th</sup>, 14<sup>th</sup> Amendment, NV Const Art1. Sec. 1.,  
6., 8., 9., NRS 199.310 Malicious Prosecution.

10. Mr. Ribar also tried to communicate, publish and disseminate the video of his  
Unconstitutional and unlawful arrest via the Carson City Sheriff's Office  
Facebook page operating as a governmental social media page. When Mr.  
Ribar posted videos and comments of his arrest and other news to  
disseminate to the public via the Carson City Sheriff's Office Facebook  
government social media page, he was blocked from the page quashing his  
Free Speech Rights without Due Process. This action violated Mr. Ribar's US  
Const. 1<sup>st</sup> & 14<sup>th</sup> Amendment and Nevada Constitution Art. 1 Sec. 9 Rights.  
Garnier v. O'Connor-Ratcliff 9<sup>th</sup> Cir.

### Paragraph 3. Damages

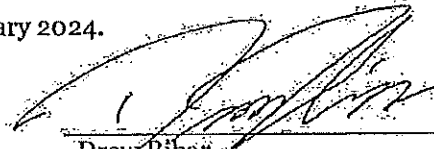
1. Compensatory Damages: All the costs to include, time, money, loss of access  
to public spaces and opportunities, out of pocket expenses, lost wages,  
property damage, pain, suffering, emotional distress, loss of enjoyment of life,  
loss of companionship in the amount of \$10,000.00 per day (477 days total)  
that Mr. Ribar's Liberty was denied, \$1,000,000.00 for arresting, torture,  
booking, body scanning, and confining Mr. Ribar or as the Court determines.
2. Punitive damages as the defendants acted with knowledge and forethought  
from the initial encounter where Lt. Ryder would not communicate regarding  
RIGHTS or laws as well as the conclusion of the arrest with the Court  
dismissing the case only after the prosecutor Tyson League took his pound of

COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY  
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1 flesh in the form of a monetary penalty and extending the restrictions of  
2 accessing public property and services of the State of Nevada until December  
3 20, 2023 a total of 477 days that Mr. Ribar's Constitutional Rights were  
4 violated. Damages requested in the amount the Court finds.

- 5 3. Injunctive Relief sought from the Court in issuing an order to all named  
6 governmental entities listed in this lawsuit to require annual mandatory  
7 Constitutional and legal training for all employees to ensure tax funded  
8 governmental employees know and understand our Rights and laws to better  
9 serve the people. Order the Carson City District Attorney not to amend  
10 charging documents to distort facts and to not prosecute a member of the  
11 press with no other legal basis.  
12

13 Dated this 29<sup>th</sup> day of January 2024.

14   
15 Drew Ribar  
16 Pro Se

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25 COMPLAINTJURY TRIAL DEMANDED(EXEMPT FROM ARBITRATION PER NAR 3(A) DECLARATORY  
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